

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 07 CR 773
	)	Hon. Charles R. Norgle, Sr.
JOSHUA HINES	)	

**JOINT MOTION FOR EARLY RETURN OF TRIAL SUBPOENAS**

The UNITED STATES OF AMERICA, by and through its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, and defendant Joshua Hines, by and through his attorney, HELEN J. KIM, respectfully submit this joint motion for early return of trial subpoenas. In support of their motion, the parties state:

1. After reviewing the discovery provided by the government, defense counsel requested certain additional information. In order to obtain that information, the government needs to issue a subpoena. In addition, defense counsel wishes to subpoena certain information pertaining to defendant's criminal history.

2. Counsel for both parties agree to entry of an order permitting early return of trial subpoenas. The parties agree to turn over to the other side whatever materials are collected through use of such subpoenas.

WHEREFORE, the parties jointly request that the Court permit both parties to serve trial subpoenas with early return dates. A draft Order is enclosed.

Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney

By: s/ Julie B. Ruder  
JULIE B. RUDER  
Assistant United States Attorney  
219 South Dearborn Street  
Chicago, Illinois 60604  
(312) 886-1317

s/ Helen J. Kim  
HELEN J. KIM  
Federal Defender Program  
55 E. Monroe, Suite 2800  
Chicago, IL 60603  
(312) 621-8344

**CERTIFICATE OF SERVICE**

The undersigned Assistant United States Attorney hereby certifies that the following document:

Joint Motion for Early Return of Trial Subpoenas

was served on January 31, 2008, in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

s/ Julie B. Ruder

---

JULIE B. RUDER

Assistant United States Attorney

219 South Dearborn Street

Chicago, Illinois

(312) 886-1317